## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

	Case No. 4:22-CV-343-Y
Case No. 4:22-CV-430-Y	

# APFA DEFENDANTS' RESPONSE IN OPPOSITION TO PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT

### TO THE HONORABLE TERRY R. MEANS:

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Defendants the Association of Professional Flight Attendants ("APFA"), its National President, Julie Hedrick, and its National Treasurer, Erik Harris (collectively, "the APFA Defendants"), file this Response in Opposition to Plaintiffs' Motion for Partial Summary Judgment, Doc. 237. As set forth in the accompanying Memorandum, the APFA Defendants submit that Plaintiffs have not carried their burden of establishing undisputed material facts to support their motion, or grounds for judgment as a matter of law based on such facts. In addition, the APFA Defendants respectfully submit that they are entitled to summary judgment on their own motion for the reasons set forth in support thereof. Docs. 234-236.

#### LEGAL AND FACTUAL GROUNDS SUPPORTING THIS RESPONSE

Under Local Rule 56.4(b), the legal and factual grounds on which the APFA Defendants rely are included in the accompanying Memorandum. Supporting evidence is set forth in the

previously filed Appendix, which was filed in support of the APFA Defendants' Motion for Summary Judgment (Doc. 236) and in a Supplemental Appendix, which is filed herewith.

Dated: May 24, 2024 Respectfully submitted,

/s/ James D. Sanford

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# **CERTIFICATE OF SERVICE**

I certify that on May 24, 2024, a true and correct copy of the foregoing document was served upon all persons who have requested notice and service of pleadings in this case via the Court's ECF system.

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